

RESPONSE TO COMMENTS

This document has been prepared in accordance with Tennessee Rule 1200-1-11-.07(7)(j). It has resulted from the Tennessee Division of Solid Waste Management's issuance of a draft permit for permit reissuance (renewal) for the continued post-closure care and monitoring of one hazardous waste disposal unit and for corrective action, to Severn Trent Laboratories, Inc. (STL), EPA ID Number TND 05 469 2967, located at 5815 Middlebrook Pike, Knoxville, Tennessee.

Part A of this document describes the efforts made by the Tennessee Division of Solid Waste Management (DSWM) to obtain public input. Part B summarizes and responds to all significant comments received.

A. Public Involvement Opportunities

Severn Trent Laboratories, Inc. (STL), issued a pre-application public notice in the April 12, 2003, edition of the The Knoxville News-Sentinel, stating that a public meeting would be conducted in the offices of STL at 5815 Middlebrook Pike, Knoxville, Tennessee, on May 12, 2003, concerning the post-closure permit renewal application. DSWM received the Part A and Part B permit renewal applications from STL on May 14, 2003.

A public notice was prepared by DSWM of its intent to reissue the post-closure hazardous waste permit and it was public noticed by STL in the July 21, 2004, edition of the The Knoxville News-Sentinel. Several (30 second) announcements of the action, referencing the notice published in the newspaper, were also provided over two local radio stations (WKVL-AM/FM, Knoxville and WNOX-AM/FM, Knoxville). The Public Notice advised the public that copies of the draft post-closure permit and associated materials were available for review at DSWM's Knoxville Environmental Assistance Center, 2700 Middlebrook Drive, Knoxville, Tennessee (865-594-6035); West Knoxville Branch Library, 6800 Kingston Pike, Knoxville, Tennessee (865-588-8813); and DSWM's Central Office, 5th Floor, L & C Tower, 401 Church St., Nashville, TN 37243-1535 (615-532-0780). The Notice also established a 45-day comment period (ending September 3, 2004) and described how interested persons could comment in writing on the proposed action. It further described that any interested person could request a public hearing or obtain further information.

B. Public Comment/Response Summary

No comments were received from the public during the community meeting conducted by STL on May 12, 2003. There were no written comments received from the facility or from the public, during the 45-day comment period on the draft permit public noticed on July 21, 2004. There were two comments from DSWM and they are addressed below.

RESPONSE TO DSWM COMMENTS

1. **Comment:** Under Appendix 6-2, Sampling and Analysis Plan, the 6 checklists were addressed as Attachments (e.g. Attachment 1, Checklist for Water Level Measurements etc.). To avoid confusion with the main permit attachments, this should be changed to Checklist 1 etc. and the word “for” should be deleted.

Response: The changes have been made.

2. **Comment:** In Attachment 8, the Appendices are identified as Appendix 8A, Appendix 8B etc. In order to be consistent with the other attachment's appendices in the permit, these should be revised to read Appendix 8-1, Appendix 8-2 etc. The pages should also be renumbered as 8-1-1, 8-2-1 instead of 8A-1, 8B-1 etc.

The references to these appendices should also be revised under Section V, “Specific Conditions For Corrective Action”.

Response: The changes have been made.

3. **Comment:** In Appendix 6-3, the title of the cover page reads: “Groundwater Monitoring Well and Construction Diagrams”. It should be rephrased to read: “Groundwater Monitoring Well Point of Compliance System and Construction Diagrams”.

Response: The change has been made.

4. **Comment:** In Section IV.A.1, the sentence ends with the phrase, “....found in Attachment 6”. It should read “....found in Attachment 6, Appendix 6-3”.

Response: The change has been made.